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July 1, 2014

**VIA ECF FILING
AND E-MAIL TRANSMISSION**

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.
Case No. 09-50026 (REG)**

Phaneuf No Stay Pleading

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. On June 13, 2014, New GM filed with the Court the *Response by General Motors LLC to No Stay Pleading filed in Connection with the Court’s May 16, 2014 Scheduling Order* (“**Response**”) [Dkt. No. 12724]. In the Response, New GM stated that “there is a strong likelihood that the Phaneuf Plaintiffs will not be able to separately proceed in their Ignition Switch Action” because New GM “designated with the Judicial Panel for Multidistrict Litigation (“**JPML**”) the Phaneuf Ignition Switch Action as a case that should be consolidated for discovery and other pretrial proceedings.” Response, ¶ 12. As of the date of the filing of the Response, a decision on the transfer of the Phaneuf Ignition Switch Action had not yet been rendered.

On June 20, 2014, the Southern District of New York, which has been assigned the *In re: General Motors LLC Ignition Switch Litigation* (Case No. 14-MD-2543), entered an Order (“**June 20 Order**”) transferring to that Court, among others, the Phaneuf Ignition Switch Action for coordinated or consolidated pretrial proceedings. A copy of the June 20 Order is annexed hereto as Exhibit “A.” Accordingly, as explained in the Response, there is no longer an independent action for the Phaneuf Plaintiffs to proceed with, and they will be on the same

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timeline as other plaintiffs whose actions have been transferred to the Multi-District Litigation (“MDL”) pending in the Southern District of New York.¹

Respectfully submitted,

/s/ Arthur Steinberg

Arthur Steinberg

AJS/sd

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¹ For the Court’s convenience, annexed hereto as Exhibit “B” is Order No 1 entered by the MDL Court on June 24, 2014.